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*Attorneys for Lac du Flambeau Band of Lake Superior Chippewa Indians dba
Niizhwaaswi, LLC dba Loan at Last*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIMOTHY TEXEIRA,
Plaintiff,

vs.

NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC., LAC DU
FLAMBEAU BAND OF LAKE
SUPERIOR CHIPPEWA INDIANS DBA
NIIZHWAASWI, LLC DBA LOAN AT
LAST, CNU ONLINE HOLDINGS, LLC,
ONE MAIN FINANCIAL, DIRETTV,
LLC AT&T CORP dba AT&T UVERSE,
CLARITY SERVICES LLC,
BACKGROUNDCHECKS.COM, LLC
Defendant.

Civil Action No. 2:22-cv-00153-GMN-DJA

**JOINT MOTION TO EXTEND TIME
FOR LAC DU FLAMBEAU BAND OF
LAKE SUPERIOR CHIPPEWA
INDIANS DBA NIIZHWAASWI, LLC
DBA LOAN AT LAST TO RESPOND
TO PLAINTIFF'S COMPLAINT**

(SECOND REQUEST)

Timothy Texeira ("Plaintiff") and Defendant Lac du Flambeau Band of Lake Superior Chippewa Indians dba Niizhwaaswi, LLC dba Loan at Last (the "Tribe") (together as "the Parties") hereby stipulate as follows:

1. The original deadline for the Tribe to respond to Plaintiff's Complaint was April 4, 2022.
2. The Parties previously agreed to an extension of this deadline up to and including May 4, 2022, to provide additional time for the Tribe to continue investigating the allegations in Plaintiff's complaint and for the Parties to discuss a possible resolution of Plaintiff's claims.

- 1 3. Now the Parties have agreed to, and hereby request that this Court grant, a 30 day
2 extension to June 5, 2022 as they continue to pursue settlement negotiations.
- 3 4. The Parties have made significant progress in their efforts to settle this case and
4 anticipate that this will be the last request for an extension.
- 5 5. The Parties agree that there is good cause for this extension as it will allow the
6 Parties to focus their efforts on settlement, which is in their best interest and also
7 better serves the interest of judicial efficiency.
- 8 6. This is the second request for an extension of this deadline and it is made in good
9 faith and not for purposes of delay.
- 10

11 DATED: May 2, 2022.

DATED: May 2, 2022.

12 **SPENCER FANE LLP**

FREEDOM LAW FIRM

13 By: /s/Mary E. Bacon
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/s/ Gerardo Avalos
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Attorney for Plaintiff Timothy Texeira

21 **ORDER**

22 **IT IS HEREBY ORDERED** that the deadline for Defendant Lac du Flambeau Band
23 of Lake Superior Chippewa Indians dba Niizhwaaswi, LLC dba Loan at Last to respond to
24 Plaintiff Timothy Texeira's Complaint is extended to June 5, 2022.

25 **DATED:** May 4, 2022

26 
27 _____
28 UNITED STATES MAGISTRATE JUDGE